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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 98-198
Table of Allotments)	RM-9304, RM-9492, RM-9524,
FM Broadcast Stations)	RM-9547, RM-9548, RM-9690
(Cross Plains, Texas et al.))	

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

SECOND REPLY COMMENTS

WBAP/KSCS Operating, Ltd. and Blue Bonnet Radio, Inc. ("WBAP/BBRI"), by their respective counsel, hereby submit reply comments pursuant to the Commission's Public Notice in the above-captioned proceeding.¹ The Public Notice described five counterproposals filed in this proceeding, including one filed by WBAP/BBRI. The purpose of this reply is to update the record with respect to certain changes that have occurred since the filing of the Counterproposal by WBAP/BBRI and provide corrections to the Commission's records. No other proposals currently pending in this proceeding conflict with WBAP/BBRI's Counterproposal.

I. Corrections to the Text of the Public Notice and Entries in the Commission's FM Engineering Data Base

The Public Notice and the Commission's FM Engineering Data Base contain several errors that should be rectified, as described below.

- ***KQXC, Wichita Falls, TX.*** The Public Notice lists incorrect coordinates for the proposed substitution of Channel 280A for Channel 273A for Station KQXC(FM),

1. Report No. 2346 (July 21, 1999).

Wichita Falls, Texas. The proposed coordinates are **33° 56' 30" North Latitude, 98° 34' 07" West Longitude**. The Data Base also contains incorrect coordinates for this proposed substitution. *See* Exhibit E, Figure 3.

- ***Vacant 278C3, Dickson, OK.*** The Public Notice lists incorrect coordinates for the proposed substitution of Channel 224A for the vacant Channel 278C3 at Dickson, Oklahoma. The proposed coordinates are **34° 07' 17" North Latitude, 96° 58' 49" West Longitude**. The Data Base also contains incorrect coordinates for this proposed substitution. In addition, the Data Base entry incorrectly refers to "Dickson, Texas" as the city of license. *See* Exhibit E, Figure 5
- ***KVWC, Vernon, TX.*** The Data Base omits the substitution of Channel 276A for Channel 272A for Station KVWC at Vernon, Texas as correctly listed in the Public Notice. *See* Exhibit E, Figure 1.
- ***KKEN, Duncan, OK.*** The Data Base contains incorrect reference coordinates in the substitution of 246A for Channel 272A for Station KKEN, Duncan Oklahoma. The correct coordinates, as listed in the Public Notice, are **34° 30' 43" North Latitude, 97° 58' 05" West Longitude**. *See* Exhibit E, Figure 2.

II. Station KHKC, Atoka, Oklahoma

On February 24, 1999, an application was filed requesting a one-step upgrade of Station KPLT-FM, Paris, Texas, from Channel 299C2 to 299C1 at a new transmitter site. *See* File No. BPH-990224IC. WBAP/BBRI filed an informal objection to this application, noting that it conflicts with the Counterproposal's proposed allotment of Channel 298A to Atoka, Oklahoma. Ordinarily, the Commission would hold the application in abeyance pending the resolution of this rule making proceeding. However, WBAP/BBRI hereby propose a resolution under which both the Counterproposal and the Paris, Texas application can be granted. Specifically, WBAP proposes, in the alternative, either one of the following two substitutions for Station KHKC at Atoka: (i) substitute Channel 271A for Channel 276C2 at reference coordinates 34° 29' 22" North Latitude, 96° 08' 07" West Longitude; or, (ii) substitute Channel 254A for Channel 276C2 at reference coordinates

34° 29' 48" North Latitude, 96° 07' 45" West Longitude. With either of these changes, the conflict between the Counterproposal and the Paris, Texas application is removed. *See* Exhibit E, Figures 6-11. The licensee of Station KHKC has consented to either of these changes in channel and class. *See* Exhibit A.

III. Station KQXC, Wichita Falls, Texas.

The Public Notice, as well as the Counterproposal and its accompanying Engineering Statement correctly noted that WBAP/BBRI's Counterproposal requires the substitution of Channel 280A for Channel 273A for Station KQXC, Wichita Falls, Texas. The licensee of Station KQXC agreed to this channel change, and WBAP/BBRI agreed to reimburse the licensee for the costs of implementing the channel change. The licensee provided WBAP/BBRI with a statement consenting to this change, but the copy of the consent statement filed with the Counterproposal contained incorrect channel numbers. The correct consent statement is provided herewith. *See* Exhibit B. This correction does not affect the acceptability of the Counterproposal for three reasons. First, the channel study and text discussion correctly specified the substitution of Channel 280A for Channel 273A. Second, no other proposal in this proceeding is adversely affected by the change. Third, the consent of the licensee was not actually necessary because only the channel is changing. *See Columbus, Nebraska*, 55 RR 2d 1185 (1986).

IV. Vacant Channel 224A, Mason, Texas

WBAP/BBRI's Counterproposal proposed the substitution of either Channel 224A or Channel 281A for the proposed allotment of Channel 291A at Mason, Texas in MM Docket No. 97-244. On June 11, 1999, the Commission issued a *Report and Order* allotting Channel 224A to

Mason. That order is now final. Therefore, no further changes need to be made with respect to the Mason allotment to effectuate the WBAP/BBRI Counterproposal.

V. Proposed Channel 276C2, Granite, Oklahoma

On April 4, 1999, Fuchs Broadcasting, Inc. filed a petition for rule making proposing to allot channel 267C2 to Granite, Oklahoma. This petition conflicts with WBAP/BBRI's proposal to substitute Channel 276A for Channel 272A at Vernon, Texas, and also its proposal to substitute Channel 278C for Channel 279C1 at Anadarko, Oklahoma. *See Exhibit E, Figures 1 & 4.* Since WBAP/BBRI's counterproposal was filed at the deadline for conflicting proposals, the subsequently filed petition for Granite cannot be processed.

VI. Wagonwheel Has Eliminated the Conflict with its New Allotment at Santa Anna.

Wagonwheel Broadcasting of Santa Anna filed a petition for rule making requesting the allotment of Channel 290C2 to Santa Anna, Texas. That proposal conflicted with WBAP's proposal to allot Channel 290C3 to Cross Plains, Texas and its proposal to substitute Channel 291A for Channel 246A at San Saba, Texas. On August 4, 1999, Wagonwheel amended its proposal to request the allotment of Channel 288C3 at Santa Anna.² The amended proposal removes all conflicts with the WBAP Counterproposal. *See Exhibit E, Figure 12.* No statement from WBAP/BBRI is necessary since there are no agreements, oral or written, express or implied, between Wagonwheel and WBAP/BBRI. *See 47 C.F.R. §1.420(j).*

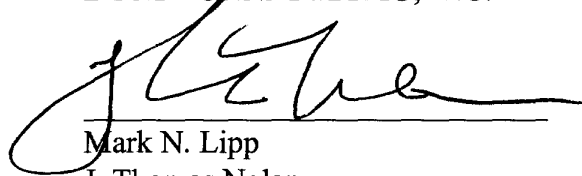
2. *See Reply Comments and Counterproposal of Wagonwheel (filed Aug. 4, 1999).*

CONCLUSION

WBAP/BBRI commends the Commission's staff for its efforts in reviewing the complex proposals in this proceeding. With the few changes noted herein, the way is cleared for the Counterproposal to be granted. BBRI hereby reaffirms its interest in applying for Channel 277C at Allen, Texas if reallocated as proposed. WBAP/BBRI can assure the Commission that, although complex, the Counterproposal can be effectuated in a timely manner with minimum disruption to the public and without undue strain on the Commission's resources.

Respectfully submitted,

WBAP/KSCS OPERATING, LTD.
BLUE BONNET RADIO, INC.



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Their Counsel

August 5, 1999

3. New address and telephone number.

EXHIBIT A

Consent Statement for KHKC, Atoka, Oklahoma

**Atoka, Oklahoma
Station KHKC**

Ballard Broadcasting of Oklahoma, Inc. ("Ballard"), licensee of Station KHKC, Atoka, Oklahoma, hereby agrees to have Station KHKC's channel allotment modified from Channel 276C2 to either Channel 271A, 254A, or 298A, and change its transmitter site. Ballard will file an application for the new site, channel and class if the Commission approves the changes.

Station KHKC is currently being operated as a Class A station, and Ballard has an application pending before the FCC to operate KHKC with Class C2 facilities (File No. BPII-981109II). Ballard hereby certifies that it has not been paid, agreed to be paid, or been promised any payment in exchange for dismissing its pending application. Indeed, Ballard intends to continue to prosecute that application. Should the Commission grant the pending application before the finality of an order in this proceeding, Ballard intends to construct the facilities within the allowed construction period and operate KHKC as a Class C2 station. Should the Commission subsequently order the modifications referred to above, Ballard will downgrade KHKC to a Class A station and implement the additional modifications.

The agreement between Ballard and WBAP/KSCS Operating, Ltd. is to pay Ballard for the expenses relating to downgrading Station KHKC to a Class A, changing channels, and relocating the transmitter site. There is no agreement between Ballard and anyone, including the parties to the WBAP counterproposal, whereby Ballard has agreed to be paid any consideration in exchange for dismissing its Class C2 upgrade application.

Ballard understands that this statement may be used in filing with the Federal Communications Commission and hereby authorizes its use for that purpose.

I verify that this statement is true and accurate to the best of my knowledge, information and belief and is made in good faith.

BALLARD BROADCASTING OF OKLAHOMA, INC.

By: 

Drew Ballard
President

EXHIBIT B

Consent Statement for KQXC, Wichita Falls, Texas

**Station KQXC
Wichita Falls, Texas**

Cumulus Licensing Corporation ("Cumulus"), licensee of Station KQXC, Wichita Falls, Texas, hereby agrees to have Station KQXC's license modified to change channel from Channel 273A to 280A. Cumulus will file an application to implement the channel change if approved by the Commission. Cumulus understands that this statement may be used in a filing with the Federal Communications Commission and hereby authorizes its use for that purpose.

I verify that this statement is true and accurate to the best of my knowledge, information and belief and is made in good faith.

CUMULUS LICENSING CORPORATION

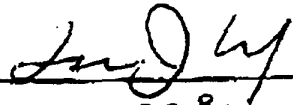
By: 
Its: Vico Cronin

EXHIBIT E
ENGINEERING STATEMENT

Engineering Statement
In Support of
Second Reply Comments
MM Docket 98-198
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating, Ltd.

The instant engineering statement is submitted in support of the counterproposal in the above captioned docket that was filed by Blue Bonnet Radio, Inc. and WBAP/KSCS Operating, Ltd. (collectively known as "WBAP/KSCS"). There have been some changes in the Commission's technical database that have a direct bearing on the implementation of the WBAP/KSCS counterproposal. In addition, the Public Notice (Report Number 2346) and the Commission's technical database contain minor errors that should be corrected.

The corrections are as follows:

1. ***KVWC, Vernon, Texas.*** The Public Notice correctly lists the proposed substitution of channel 276A for channel 272A at the current licensed site of KVWC. However, the database omits this substitution entirely. A channel study for channel 276A at the KVWC licensed reference shows a proposed drop-in channel for channel 276C2 at Granite, Oklahoma. According to the database, the Granite petition has not been given a rule making number. It should be noted that a short space of 60.57 kilometers exists between the proposed substitution of channel 276A at Vernon and channel 276C2 at Granite. According to the database, the Granite petition was filed on April 19, 1999. Therefore, it is a late-filed counterproposal.
2. ***KKEN, Duncan, Oklahoma.*** The Public Notice lists the correct coordinates for the substitution of channel 246A for channel 272A at the licensed site of KKEN. However, the database contains incorrect coordinates. The minutes of north latitude appear as "03" in the database when they should be listed as "30". All other parts of the entry are correct.

3. ***KQXC, Wichita Falls, Texas.*** The Public Notice and the database contain incorrect reference coordinates for the substitution of channel 280A for channel 273A for use by KQXC. The WBAP/KSCS counterproposal proposes substitution of channel 280A at the licensed reference coordinates of KQXC. Therefore, the Public Notice and database should be corrected to include the licensed site of KQXC as reference for the channel 280A substitution.
4. ***KRPT, Anadarko, Oklahoma.*** All references to the substitution of channel 278C for channel 279C1 at Anadarko are correct in the database and Public Notice. However, when the channel spacing study for channel 278C is conducted using the proposed allotment coordinates, the previously mentioned petition for the allocation of channel 276C2 at Granite, Oklahoma appears with a short space of 20.83 kilometers. To reiterate, this is a late-filed counterproposal.
5. ***AD224A, Dickson, Oklahoma.*** The WBAP/KSCS counterproposal proposed the deletion of channel 278C3 and the substitution of the mutually exclusive I.F. channel of 224A. The Public Notice and the database incorrectly list the reference coordinates. When the WBAP/KSCS coordinates are used, channel 224A at Dickson is fully spaced. However, if the reference coordinates in the database are used, there is a 17.65 kilometer short space to KOMA(FM), Oklahoma City, Oklahoma. The Public Notice lists Dickson as being in the state of Oklahoma, while the database incorrectly lists Dickson as being in the state of Texas.
6. ***KHHC, Atoka, Oklahoma.*** On February 24, 1999, the licensee of KPLT, channel 299C2, Paris, Texas, filed an application for a one-step upgrade to channel 299C1. The applicant was not aware of the Atoka channel 298A substitution proposed by WBAP/KSCS, since it did not appear in the database at that time. A channel study for channel 298A at Atoka shows a short space to the allocation coordinates of channel 299C1 at Paris of 18.59 kilometers. However, WBAP/KSCS hereby offers a resolution to that conflict by proposing the substitution of channel 271A or channel 254A in lieu of channel 298A at Atoka. The WBAP/KSCS preference for channel substitutions at Atoka are as follows: 1) substitute channel 271A for channel 276C2; 2) substitute channel 254A for channel only if, for some reason unknown to WBAP/KSCS, channel 271A is not available for substitution; 3) substitute channel 298A for channel 276C2 only if either of the previously mentioned channels are not available for substitution. The substitution of channel 271A or channel 254A will eliminate the spacing conflict between a substitute channel at Atoka and the proposed one-step upgrade of KPLT.

In addition to the needed database and Public Notice changes listed above, changes have occurred in the database that has simplified the implementation of the WBAP/KSCS counterproposal. Those changes are as follows:

1. ***AD290C2, Santa Anna, Texas.*** The petitioner for channel 290C2 at Santa Anna, Texas, Wagonwheel Broadcasting of Santa Anna ("Wagonwheel"), has notified WBAP/KSCS of its intent to withdraw its interest in channel 290C2 in lieu of channel 288C3. This change in channel request eliminates short spacing between Santa Anna on channel 290C2 and the WBAP/KSCS proposed substitution of channel 291A for channel 246A at the licensed site of KBAL, San Saba, Texas.
2. ***AD291A, Mason, Texas.*** At the time of the WBAP/KSCS counterproposal, channel 291A was proposed to be allocated at Mason, Texas. This proposed allocation was in conflict with channel 291A at the licensed site of KBAL, San Saba, Texas. WBAP/KSCS offered substitute channels of 224A, 259A, and 281A. However, in a subsequent proceeding (MM Docket 97-244), the Commission allotted channel 224A to Mason, Texas in lieu of channel 291A. Therefore, channel 291A at Mason no longer exists as a conflict with channel 291A at San Saba.

Exhibits Explained

Exhibit E, Figure 1 is an allocation study using the licensed site of KVWC, Vernon, Texas as reference. The channel considered is 276A. This proposed substitution should be placed in the Commission's database in order to provide protection for KVWC on channel 276A. As discussed earlier, the database lists a proposed allotment of channel 276C2 at Granite, Oklahoma. Due to the filing date, this petition must be considered as an untimely filed counterproposal in the WBAP/KSCS proceeding.

Exhibit E, Figure 2 is a channel study for the substitution of channel 246A at the licensed site of KKEN, Duncan, Oklahoma. The study lists the incorrect coordinates in the database concerning AD246A at Duncan. It is apparent that this error occurred simply from the transposition of number in the minutes of the latitude.

Exhibit E, Figure 3 is a channel study that uses the licensed coordinates of KQXC in Wichita Falls, Texas as reference. The channel considered is 280A. It shows the incorrect coordinates for this substitution that are listed in the Public Notice and the

database. This error should be corrected in order to give KQXC the necessary spacing protection for channel 280A at its current site.

Exhibit E, Figure 4 is a channel study using the proposed allocation coordinates for channel 278C at Anadarko, Oklahoma. The study depicts the previously mentioned petition for channel 276C2 at Granite, Oklahoma.

Exhibit E, Figure 5 is a channel spacing study using the correct coordinates for the proposed substitution of channel 224A for channel 278C3 at Dickson, Oklahoma. The study shows the incorrect coordinates shown in the Commission's database. This change should be made in order to give all the applicants at Dickson the required channel spacing protection for channel 224A.

Exhibit E, Figures 6 and 7 are allocation studies for the proposed substitution of either channel 271A or channel 254A in lieu of channel 298A as alternatives for channel 276C2 at Atoka, Oklahoma. Exhibit E, Figure 8 is a portion of the USGS 7.5-minute quadrangle for Lehigh, Oklahoma. This exhibit has the reference coordinates for channel 271A and channel 254A plotted. Both of these reference sites are usable tower locations. Exhibit E, Figure 9 is a hypothetical class A 70-dBu contour map that shows 100% of the city of Atoka will be covered by AD271A. Exhibit E, Figure 10 is a hypothetical class A 70 dBu contour map that shows 100% of the city of Atoka will be covered by AD254A.

Exhibit E, Figure 11 is an allocation study for modified reference coordinates for channel 298A at Atoka. As discussed previously, it is the WBAP/KSCS preference that channel 271A be used as the substitution for channel 276C2. If channel 271A is not available for substitution at Atoka, the second preference is that channel 254A be used in lieu of channel 276C2. Channel 298A, even with its modified reference coordinates, should be considered as a substitute channel of last resort, since its allocation creates short spacing

to the proposed one-step upgrade of channel 299C1 at Paris, Texas. Furthermore, if either channel 271A or channel 254A is available for substitution, WBAP/KSCS requests that channel 298A be dropped from consideration as a substitute channel at Atoka and that the Paris proceeding be processed separate from all other proceedings in MM Docket 98-198. Exhibit E, Figure 12 is a hypothetical class A 70 dBu contour for channel 298A at Atoka. Like channels 254A and 271A, channel 298A also covers 100% of Atoka.

Exhibit E, Figure 13 is an allocation study using the requested the Wagonwheel allotment coordinates for channel 288C3 in lieu of channel 290C2, per their withdrawal of interest in channel 290C2 at Santa Anna, Texas. This study reveals that there are no conflicts between any of the WBAP/KSCS options in MM Docket 98-198 and the allotment of channel 288C3 at Santa Anna.

Conclusion

The instant engineering statement supports the WBAP/KSCS reply concerning minor changes needed in the Commission's Public Notice and database necessary to bring them into agreement with the WBAP/KSCS counterproposal. In addition, this statement has verified that subsequent changes in other spectrum proceedings have made some aspects of the WBAP/KSCS counterproposal moot.

ENGINEERING STATEMENT

In Support of

Second Reply Comments
MM Docket 98-198
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating, Ltd.

ALLOCATION STUDY - CHANNEL 276A (KVWC) VERNON, TX
[DEPICTING SPACING FOR USE OF CH 276A AT KVWC.L SITE]
(USING KVWC.L SITE AS REFERENCE)

34 09 12 N.			Class A				Search Date
99 16 09 W.			Current rules spacings				08-04-99
----- Channel 276A -103.1 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin

AD276	276C2	Granite	OK	349.6	105.43	166.0	-60.57 *
Of Concern: Petition for Drop-In That Was Late-Filed and Cannot be Considered In MM Docket 98-198							
DE277	277C1	Wichita Falls	TX	113.0	72.92	133.0	-60.08 *
KWFSFM	277C1	Wichita Falls	TX	113.0	72.92	133.0	-60.08 *
Of Note: Substitution of CH272C1 Proposed in WBAP/KSCS Original Counterproposal							
KQXC	273A	Wichita Falls	TX	109.9	68.81	31.0	37.81
DE273	273A	Wichita Falls	TX	112.9	72.88	31.0	41.88
Of Note: Proposed Deletion of CH273A and Allocation of CH280A at Wichita Falls In MM Docket 98-198							
DE279	279C1	Anadarko	TX	43.1	119.86	75.0	44.86
KRPTFM	279C1	Anadarko	OK	43.1	119.86	75.0	44.86
DE278	278C3	Wellington	TX	281.7	91.46	42.0	49.46

ENGINEERING STATEMENT

In Support of

Second Reply Comments MM Docket 98-198 Blue Bonnet Radio, Inc. WBAP/KSCS Operating, Ltd.

ALLOCATION STUDY - CHANNEL 246A (KKEN) DUNCAN, OK [DEPICTING SPACING FOR USE OF CH 246A AT KKEN.L SITE] (USING KKEN.L SITE AS REFERENCE)

34 30 43 N.				Class A				Search Date
97 58 05 W.				Current rules spacings				08-04-99
----- Channel 246 - 97.1 MHz -----								
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin

DE246	246A	Comanche		OK	151.5	9.51	115.0	-105.49 *
KDDQ.C	246A	Comanche		OK	148.8	9.76	115.0	-105.24 *
Of Note: Deletion of CH246A and Substitution Of CH287A at Comanche, OK Proposed In MM Docket 98-198 Counterproposal by WBAP/KSCS								
AD246	246A	Duncan		OK	180.0	49.92	115.0	-65.08 *
Of Note: Incorrect Coordinates Listed In Current Commission Database Incorrect Coordinates Are: NL: 34-03-43; WL: 97-58-05								
KDDQ	244A	Comanche		OK	148.8	9.76	31.0	-21.24 *
Of No Concern: Substitution of CH246A at Comanche Made in Previous MM Docket								
KNID.C	245C	Enid		OK	8.7	164.82	165.0	-0.18 *
KWEYFM	247C1	Weatherford		OK	328.8	134.72	133.0	1.72 *
KEGL.C	246C	Fort Worth		TX	156.5	232.66	226.0	6.66 *
KGOKFM	249C3	Healdton		OK	111.0	50.06	42.0	8.06 *
KEGL	246C	Fort Worth		TX	156.3	234.22	226.0	8.22 *
ALOPEN	249C3	Healdton		OK	119.1	50.34	42.0	8.34 *
KMMY.A	246C	Muskogee		OK	70.3	246.31	226.0	20.31
KMMY	246C	Muskogee		OK	69.8	247.84	226.0	21.84
AD246	246C1	Haskell		TX	228.8	227.38	200.0	27.38

ENGINEERING STATEMENT

In Support of

Second Reply Comments
MM Docket 98-198
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating, Ltd.

ALLOCATION STUDY - CHANNEL 280A (KQXC) WICHITA FALLS, TX
[DEPICTING SPACING FOR USE OF CH 280A AT KQXC.L SITE]
(USING KQXC.L SITE AS REFERENCE)

33 56 30 N.			Class A				Search Date
98 34 07 W.			Current rules spacings				08-04-99
----- Channel 280A -103.9 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin

AD280	280A	Wichita Falls	TX	153.9	5.49	115.0	-109.51 *
Of Note:							
Incorrect Reference Coordinates Listed							
In Database and Public Notice. Original							
WBAP/KSCS Counterproposal Requested							
Substitution of CH280A at KQXC Licensed Site.							
Incorrect Coordinates Are:							
NL: 33-53-50; WL: 98-32-33							
KWFSFM	277C1	Wichita Falls	TX	154.3	5.57	75.0	-69.43 *
DE277	277C1	Wichita Falls	TX	154.3	5.57	75.0	-69.43 *
Of Note:							
Substitution of CH272C1 Proposed in							
Original WBAP/KSCS Counterproposal in							
MM Docket 98-198.							
DE279	279C1	Anadarko	TX	9.1	112.33	133.0	-20.67 *
KRPTFM	279C1	Anadarko	OK	9.1	112.33	133.0	-20.67 *
Of Note:							
Proposed Deletion of CH279C1 and							
Allocation of CH278C at Anadarko							
Proposed in Original WBAP/KSCS							
Counterproposal in MM Docket 98-198.							
KCDD	279C	Hamlin	TX	226.1	194.40	165.0	29.40
ALOPEN	282C2	Olney	TX	197.4	92.45	55.0	37.45
KMGL	281C	Oklahoma City	OK	29.0	203.95	165.0	38.95
KXZN	281C3	Sanger	TX	115.5	133.39	89.0	44.39
KVILFM	279C	Highland Park-Dal	TX	135.2	211.56	165.0	46.56
KVILFM	279C	Highland Park-Dal	TX	135.5	211.62	165.0	46.62

ENGINEERING STATEMENT

In Support of

Second Reply Comments

MM Docket 98-198

Blue Bonnet Radio, Inc.

WBAP/KSCS Operating, Ltd.

ALLOCATION STUDY - CHANNEL 278C (KRPT) ANADARKO, OK
[DEPICTING SPACING FOR USE OF CH 278C AT NEW ALLOCATION SITE]
(USING PROPOSED ALLOTMENT SITE AS REFERENCE)

35 23 18 N.			Class C				Search Date
98 37 41 W.			Current rules spacings				08-04-99
----- Channel 278 -103.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
AD278	278C	Anadarko	TX	0.0	0.00	290.0	-290.00 *
KRPTFM	279C1	Anadarko	OK	155.1	54.61	209.0	-154.39 *
DE279	279C1	Anadarko	TX	155.1	54.61	209.0	-154.39 *
Of Note: Deletion of CH279C1 and Substitution Of CH278C Proposed by WBAP/KSCS in Original Counterproposal (MM Docket 98-198)							
AP278	278C1	Alva	OK	352.6	131.73	270.0	-138.27 *
DE278	278C1	Alva	OK	350.6	134.23	270.0	-135.77 *
ALOPEN	278C1	Alva	OK	350.6	134.23	270.0	-135.77 *
Of Note: Deletion of CH278C1 and Substitution Of CH248C2 Proposed by WBAP/KSCS in Original Counterproposal (MM Docket 98-198)							
ALOPEN	278C3	Wellington	TX	246.8	160.03	237.0	-76.97 *
AD278	278C3	Wellington	TX	246.8	160.03	237.0	-76.97 *
DE278	278C3	Wellington	TX	231.2	189.23	237.0	-47.77 *
Of Note: Deletion of CH278C3 and Substitution Of CH298C3 Proposed by WBAP/KSCS in Original Counterproposal (MM Docket 98-198)							
DE277	277C1	Wichita Falls	TX	177.3	165.69	209.0	-43.31 *
KWFSFM	277C1	Wichita Falls	TX	177.3	165.69	209.0	-43.31 *
Of Note: Deletion of CH277C1 and Substitution Of CH272C1 Proposed by WBAP/KSCS in Original Counterproposal (MM Docket 98-198)							
AP278	278C3	Dickson	OK	133.4	194.64	237.0	-42.36 *
AP278	278C3	Dickson	OK	133.4	194.64	237.0	-42.36 *
AP278	278C3	Dickson	OK	132.2	198.41	237.0	-38.59 *
ALOPEN	278C3	Dickson	OK	131.5	200.98	237.0	-36.02 *
DE278	278C3	Dickson	TX	131.5	200.98	237.0	-36.02 *
AP278	278C3	Dickson	OK	131.8	201.21	237.0	-35.79 *
Of Note: Deletion of CH278C3 and Substitution Of CH224A Proposed by WBAP/KSCS in Original Counterproposal (MM Docket 98-198)							
AD276	276C2	Granite	OK	246.7	84.17	105.0	-20.83 *
Of Concern: Petition for Drop-In That Was Late-Filed and Cannot be Considered In MM Docket 98-198.							
KMGL	281C	Oklahoma City	OK	80.2	104.98	105.0	-0.02 *
AD277	277C	Allen	TX	142.9	254.21	241.0	13.21

ENGINEERING STATEMENT

In Support of

**Second Reply Comments
MM Docket 98-198
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating, Ltd.**

**ALLOCATION STUDY - CHANNEL 271A (AL276C2) ATOKA, OK
[DEPICTING SPACING FOR USE OF CH 271A AT ALLOCATION SITE]
(USING PROPOSED ALLOCATION SITE AS REFERENCE)**

34 29 22 N.			Class A				Search Date	
96 08 07 W.			Current rules spacings				08-04-99	
-----			Channel	271	-102.1	MHz	-----	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	
-----			-----					
Community of Atoka			OK	179.6	11.83			
Reference Coordinates:								
North Latitude: 34-22-58								
West Longitude: 96-08-04								
KTST	270C	Oklahoma City	OK	309.3	162.23	165.0	-2.77 *	
Of No Concern:								
Auxiliary site of KTST								
KBUS	270C2	Paris	TX	140.9	105.51	106.0	-0.49 *	
KTXQ	271C	Fort Worth-Dallas	TX	200.2	225.53	226.0	-0.47 *	
AD272	272A	Madill	OK	234.2	72.60	72.0	0.60 *	
KMADFM	272A	Madill	OK	234.2	72.60	72.0	0.60 *	
KTST	270C	Oklahoma City	OK	313.4	171.11	165.0	6.11 *	
KTST.C	270C	Oklahoma City	OK	314.9	174.31	165.0	9.31 *	
KENAFM	271C3	Mena	AR	86.9	173.46	142.0	31.46	
KTFXFM	271A	Warner	OK	35.0	147.31	115.0	32.31	
AP217	217C1	Ada	OK	300.8	59.47	22.0	37.47	
AD274	274A	Sopher	OK	137.8	68.53	31.0	37.53	
KMADFM	273C2	Whitesboro	TX	197.8	92.92	55.0	37.92	
AP217	217C1	Ada	OK	293.7	60.57	22.0	38.57	
ALOPEN	273C2	Whitesboro	TX	218.8	94.65	55.0	39.65	

ENGINEERING STATEMENT

In Support of

Second Reply Comments
MM Docket 98-198
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating, Ltd.

ALLOCATION STUDY - CHANNEL 254A (AL276C2) ATOKA, OK
[DEPICTING SPACING FOR USE OF CH 254A AT ALLOCATION SITE]
(USING PROPOSED ALLOCATION SITE AS REFERENCE)

34 29 48 N.			Class A				Search Date
96 07 45 W.			Current rules spacings				08-04-99
----- Channel 254 - 98.7 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin

Community of Atoka			OK	182.2	12.64		
Reference Coordinates:							
North Latitude: 34-22-58							
West Longitude: 96-08-04							
KLUVFM	254C	Dallas	TX	199.6	204.00	226.0	-22.00 *
Of No Concern:							
Auxiliary site of KLUV							
KLUVFM	254C	Dallas	TX	200.2	225.51	226.0	-0.49 *
KACO	253C3	Ardmore	OK	248.3	94.50	89.0	5.50 *
KYIS	255C	Oklahoma City	OK	313.6	170.97	165.0	5.97 *
KVOOFM	253C	Tulsa	OK	0.9	187.95	165.0	22.95
KADAFM	257A	Ada	OK	294.8	56.69	31.0	25.69
ALOPEN	257A	Ada	OK	292.8	60.76	31.0	29.76
AD255	255A	Reno	TX	152.1	103.79	72.0	31.79
KGAP	253C2	Clarksville	TX	133.7	141.92	106.0	35.92

AD271A and AD254A
Atoka, Oklahoma
Site Plots
(Showing Usable Property
Exists For Both Allotments)
Lehigh, OK 7.5-Minute
USGS Topo Map

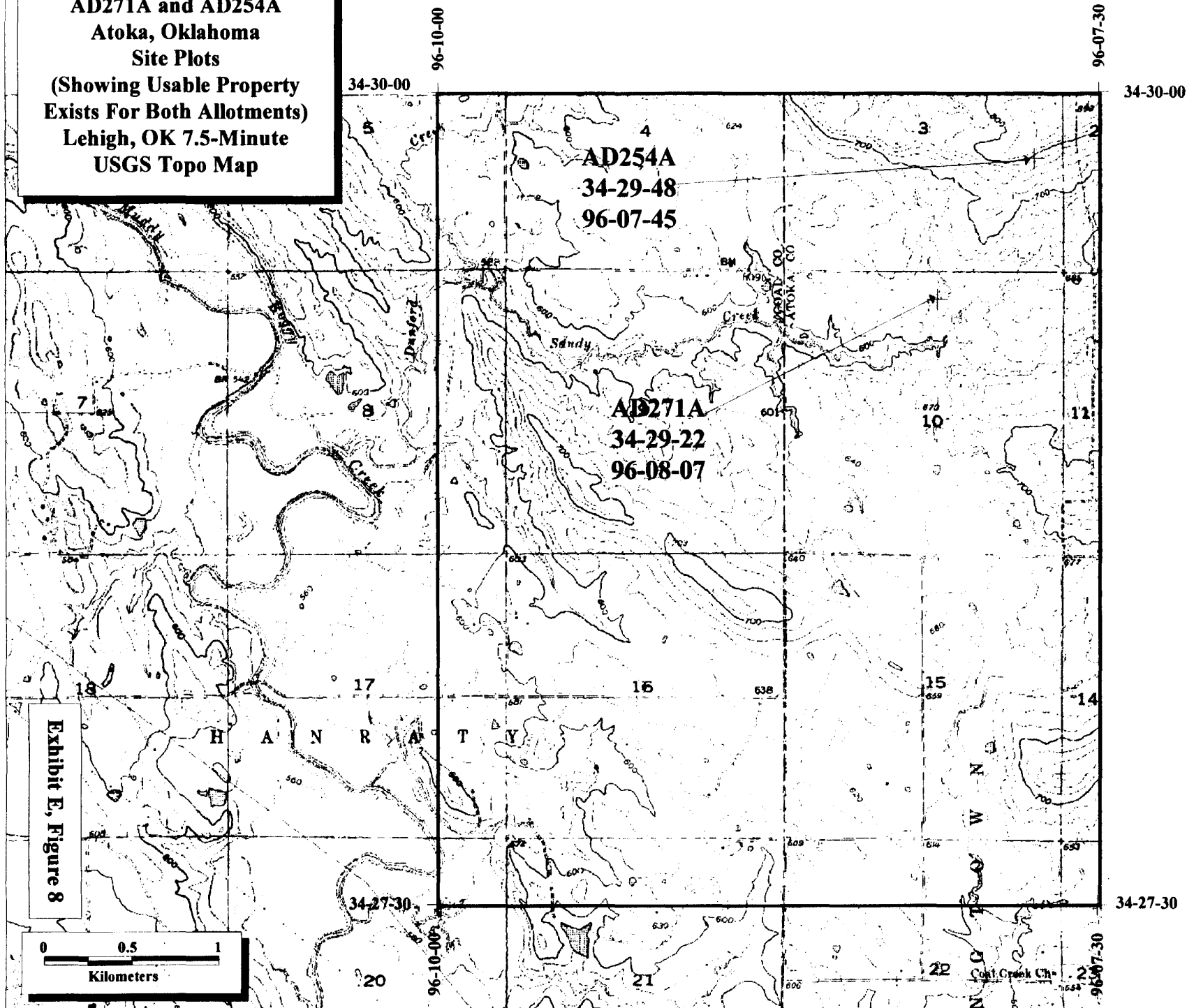


Exhibit E, Figure 8

**AD271A
Atoka, Oklahoma
Hypothetical
70 dBu Contour**

Coal
Cent
Tupelo
**AD271A
Hypothetical
70 dBu Contour**

Coalgate

Phillips

Lehigh

**AD271A
34-29-22
96-08-07**

Stringtown

Atoka

**Atoka
City
Boundaries**

Exhibit E, Figure 9

**0 5 10
Kilometers**



AD254A
Atoka, Oklahoma
Hypothetical
70 dBu Contour

Coal
Central
Tupelo

AD254A
Hypothetical
70 dBu Contour

AD254A
34-29-48
96-07-45

Atoka

Coalgate
Phillips
Lehigh

Stringtown

Atoka
City
Boundaries

Exhibit E, Figure 10

0 5 10
Kilometers



ENGINEERING STATEMENT

In Support of

Second Reply Comments
MM Docket 98-198
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating, Ltd.

ALLOCATION STUDY - CHANNEL 298A (AL276C2) ATOKA, OK
[DEPICTING SPACING FOR USE OF CH 298A AT MODIFIED ALLOCATION SITE]
(USING PROPOSED MODIFIED ALLOCATION SITE AS REFERENCE)

34 28 56 N.				Class A			Search Date
96 04 46 W.				Current rules spacings			08-04-99
-----				Channel 298 -107.5 MHz	-----		
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----				-----			
Community of Atoka			OK	204.6	12.13		
Reference Coordinates:							
North Latitude: 34-22-58							
West Longitude: 96-08-04							
AD298	298A	Atoka	OK	273.4	0.51	115.0	-114.49 *
Of Note:							
Reference Site of AD298A Presently							
In the Database							
ALOPEN	299C1	Paris	TX	145.0	114.09	133.0	-18.91 *
KPLT.A	299C1	Paris	TX	136.9	120.51	133.0	-12.49 *
Of Concern							
One Step Upgrade Proposed by							
KPLT Licensee. Channel 298A to be							
Considered in WBAP/KSCS Counterproposal							
As Substitute for CH276C2 at Atoka only							
If CH271A or CH254A Are Not Available.							
KPLTFM	299C2	Paris	TX	152.7	105.73	106.0	-0.27 *
KOMS	297C	Poteau	OK	71.1	164.92	165.0	-0.08 *
ALOPEN	296C3	Durant	OK	227.8	42.37	42.0	0.37 *
KRXO	299C	Oklahoma City	OK	312.6	174.80	165.0	9.80 *
KOAI	298C1	Fort Worth	TX	201.3	225.88	200.0	25.88
>KOAI	298C1	Fort Worth	TX	201.6	225.99	200.0	25.99
>KLBC.A	296A	Durant	OK	210.6	61.92	31.0	30.92
>KLBC	296A	Durant	OK	210.6	61.92	31.0	30.92
>DE296	296A	Durant	OK	210.6	61.92	31.0	30.92
>DE296	296A	Madill	OK	237.0	76.40	31.0	45.40
-----				-----			

**AD298A
Atoka, Oklahoma
Hypothetical
70 dBu Contour**

Coal

Centrahoma

AD298A
Hypothetical
70 dBu Contour

Coalgate

Phillips

Lehigh

Atoka

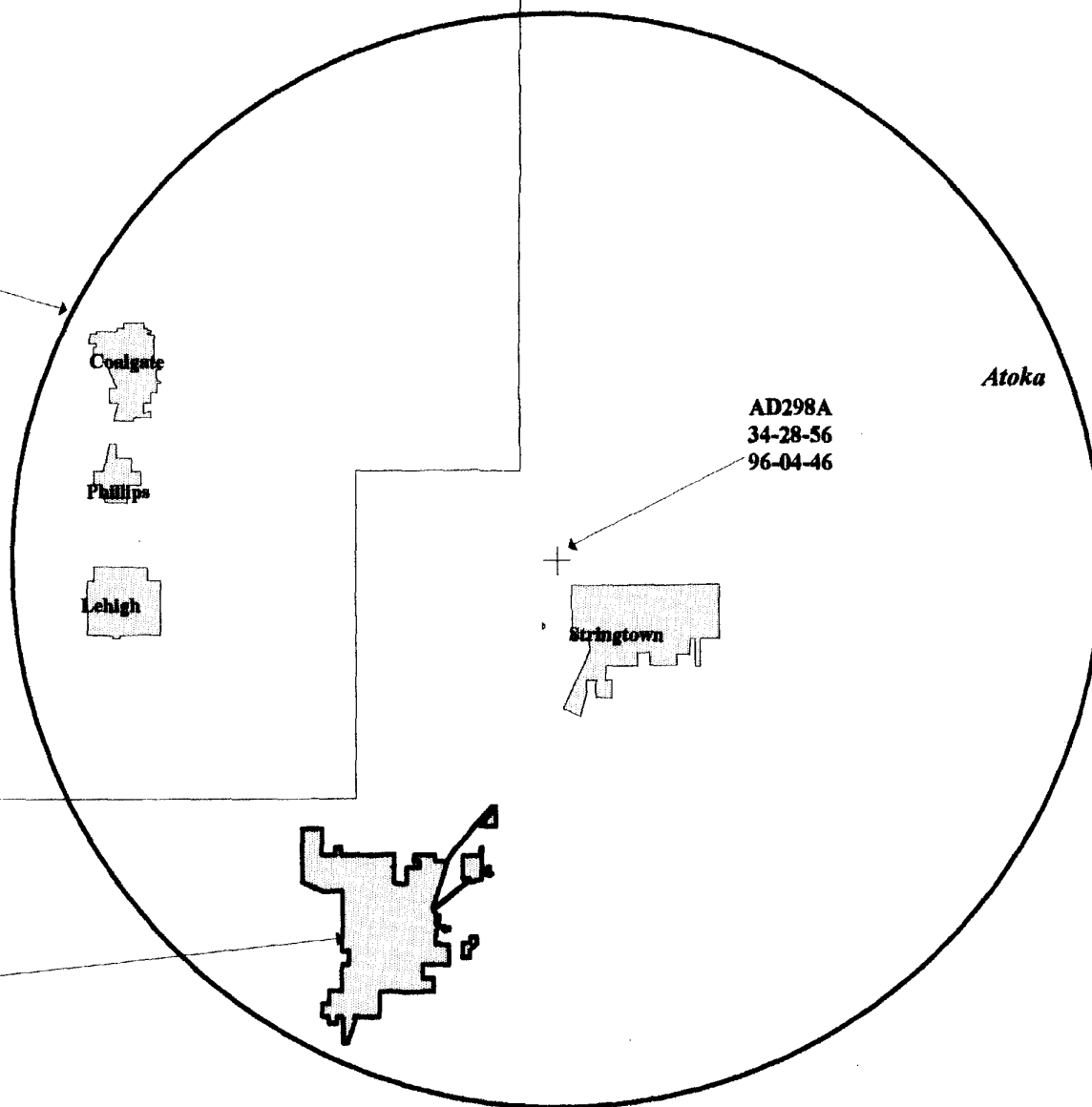
AD298A
34-28-56
96-04-46

Stringtown

Atoka
City
Boundaries

Exhibit E, Figure 12

0 5 10
Kilometers



Statement of the Consultants

The engineering section for the instant document was prepared for WBAP/KSCS Operating Ltd.; and Blue Bonnet Radio, Inc. ("WBAP/KSCS") and supports its 2nd reply comments in MM Docket 98-198. It was developed by Lee S. Reynolds and Paul H. Reynolds of Reynolds Technical Associates ("RTA") and may not be used for purposes other than submission to the Commission by WBAP/KSCS.

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The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:



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August 4th, 1999

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CERTIFICATE OF SERVICE

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 5th day of August, 1999 caused to be mailed by first class mail, postage prepaid, copies of the foregoing **"Reply Comments"** to the following:

<p>* Ms. Kathleen Scheuerle Allocations Branch Federal Communications Commission 445 12th Street, SW Room 3-A247 Washington, DC 20554</p> <p>KVWC, Inc. Box 1419 200 E. Wilbarger Vernon, TX 76384 (Licensee of KVWC(FM))</p> <p>John J. McVeigh, Esq. 12101 Blue Paper Trail Columbia, MD 21044-2787 (counsel to KVWC, Inc. and M & M Broadcasters)</p> <p>Monroe-Stephens Broadcasting, Inc. 115 W. Broadway Anadarko, OK 73005 (Licensee of KKEN(FM) and KRPT(FM))</p> <p>Lauren A. Colby, Esq. P.O. Box 113 Frederick, MD 21705-0113 (counsel to Monroe-Stephens Broadcasting, Inc.)</p> <p>Cumulus Licensing Corp. 111 E. Kilbourn Avenue Suite 2700 Milwaukee, WI 53202 (Licensee of KQXC(FM) and KYYI(FM))</p> <p>Watts Communications, Inc. Mr. Phil Watts, President P.O. Box 100 Brownwood, TX 76804-0100 (Licensee of KXYL(FM))</p>	<p>Equicom, Inc. 7103 Pine Bluffs Trail Austin, TX 78729 (Licensee of KBAL(FM))</p> <p>Anne Goodwin Crump, Esq. Fletcher, Heald & Hildreth 1300 North 17th Street 11th Floor Rosslyn, VA 22209-3801 (counsel to Equicom, Inc.)</p> <p>KWFS-FM Sub, L.P. 6 Whitfield Drive Lafayette Hill, PA 19444 (Licensee of KWFS(FM))</p> <p>Peter Gutmann Pepper & Corazzini, LLP 1776 K Street, NW Suite 200 Washington, DC 20006 (counsel to KWFS-FM Sub, L.P.)</p> <p>Harold Cochran HC-69, Box 11 Kingston, OK 73439 (Licensee of KDDQ(FM))</p> <p>George S. Flinn, Jr. 188 South Bellevue #222 Memphis, TN 38104 (Applicant for Alva, Oklahoma)</p> <p>Ballard Broadcasting of Oklahoma, Inc. 4410 10th Street Lubbock, TX 79476 (Licensee of KHKC(FM))</p>
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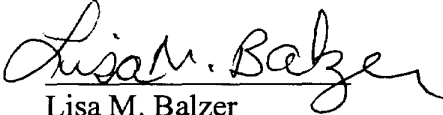
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* HAND DELIVERED